

190 EAST CAPITOL STREET, SUITE 800 (39201) P.O. BOX 427 JACKSON, MISSISSIPPI 39205-0427 601-949-4900 FAX 601-949-4804 www.joneswalker.com

> Neville II. Boschert Direct Dial: 601-949-4703 Direct Fax: 601-949-4804 nboschert@joneswalker.com

March 17, 2017

Darrell C. Baughn, Esq. Special Assistant Attorney General Mississippi Department of Corrections 633 North State Street Suite 520 Jackson, Mississippi 39202

Re Subpoenas Duces Tecum served on Mississippi Department of Corrections in United States v. Carl Reddix, United States District Court for the Southern District of Mississippi, Northern Division, No. 3:16-cr-50-DPJ-FKB and documents requested regarding The GEO Group, Inc.

## Dear Darrell:

I am writing this letter on behalf of my client The GEO Group, Inc. ("GEO") regarding the subpoenas duces tecum served on the Mississippi Department of Corrections ("MDOC") in United States v. Carl Reddix, United States District Court for the Southern District of Mississippi, Northern Division, No. 3:16-cr-50-DPJ-FKB. These subpoenas purport to request documents relating to the provision of services to MDOC by GEO.

GEO objects to MDOC producing any requested documents related to GEO until GEO has had the opportunity to review the documents that MDOC gathers in response to the subpoenas and register objections to production of those documents. Confidential and proprietary information contained in the documents constitutes trade secrets that are valuable assets of GEO and must be kept confidential.

Public disclosure of confidential and proprietary commercial financial information to present or future competitors would compromise GEO's ability to compete fairly in a highly specialized competitive business in which contracts are obtained through a competitive bidding process. Because this confidential information in these materials is critical to GEO's competitive position in the industry, no documents requested should be produced unless all confidential

EXHIBIT

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information is redacted and/or an appropriate protective order is entered to protect GEO's trade secrets and confidential proprietary information.

GEO requests that MDOC cooperate with GEO to protect GEO's interests by filing a motion to quash or for protective order to stay production to Honorable Dan Jordan, United States District Judge, or alternatively to stay further dissemination of any documents until GEO has had an opportunity to register objection to the production of confidential information and trade secrets contained in the documents related to GEO.

Thank you very much for your attention to this matter.

Mille P. Bond

Neville H. Boschert

**NHB**